

### REMARKS

Claims 33-60 remain in the present application. Claims 33, 39, 45, 51 and 56 are amended herein. Applicants respectfully submit that no new matter has been added as a result of the claim amendments. Applicants respectfully request further examination and reconsideration of the rejections based on the arguments set forth below.

#### Claim Rejections – 35 U.S.C. §102

Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as "Mills"). Applicants respectfully submit that the embodiments of the present invention as recited in Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are neither anticipated nor rendered obvious by Mills for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 33 that recites a method of copying files comprising (emphasis added):

storing a plurality of location identifiers, wherein said plurality of location identifiers comprises a location identifier of a removable memory, wherein said plurality of location identifiers further comprises a location identifier of a memory of a portable electronic device, and wherein said removable memory is detachably coupled to said portable electronic device;

storing a file in a memory of said portable electronic device, wherein said file is associated with said location identifier of said memory; in response to a user selection of said file to copy to said removable memory, associating said location identifier of said removable memory with said file, wherein said user selection comprises a user interaction with a user interface of said portable electronic device; and

in response to said associating said location identifier of said removable memory with said file, automatically copying said file from said memory of said portable electronic device to said removable memory.

Independent Claims 39, 45, 51 and 56 recite limitations similar to independent Claim 33. Claims 34, 40, 46, 52 and 57 depend from their respective independent Claims and recite further limitations to the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of "wherein said user selection comprises a user interaction with a user interface of said portable electronic device" as recited in independent Claim 33. As recited and described in the present application, a location identifier of a removable memory is associated with a file in response to a user selection of the file to copy to the removable memory. The user selection includes a user interaction with a user interface of a portable electronic device.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Mills of a user selection of a file to copy as claimed. Further, Applicants fail to find any teaching or suggestion of a user selection which includes *a user interaction with a user interface of a portable electronic device* as claimed. Accordingly, Applicants reiterate that Mills fails to teach or suggest the limitations of "wherein said user selection comprises a user interaction with a user interface of said portable electronic device" as recited in independent Claim 33.

For these reasons, Applicants respectfully submit that independent Claim 33 is neither anticipated nor rendered obvious by Mills, thereby overcoming the 35 U.S.C. §102(e) rejection of record. Since independent Claims 39, 45, 51 and 56 recite limitations similar to those discussed above with respect to independent Claim 33, independent Claims 39, 45, 51 and 56 also overcome the 35 U.S.C. §102(e) rejections of record. Since dependent Claims 34, 40, 46, 52 and 57 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 34, 40, 46, 52 and 57 are also neither anticipated nor rendered obvious by Mills. Therefore, Claims 33-34, 39-40, 45-46, 51-52 and 56-57 are allowable.

#### Claim Rejections – 35 U.S.C. §103

Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mills in view of United States Patent Number 7,003,327 to Payne et al. (hereafter referred to as “Payne”). Applicants have reviewed the cited references and respectfully submit that the embodiments of the present invention as recited in Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are not rendered obvious by Mills in view of Payne for the following reasons.

Applicants respectfully submit that Payne, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed herein. More specifically, Applicants respectfully submit that Payne also fails to teach or suggest the limitations of “wherein said user selection comprises a user

interaction with a user interface of said portable electronic device" as recited in independent Claim 33.

Since Claims 35-38, 41-44, 47-50, 53-55 and 58-60 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are not rendered obvious by Mills in view of Payne. Therefore, Claims 35-38, 41-44, 47-50, 53-55 and 58-60 are allowable.

### CONCLUSION

Applicants respectfully submit that Claims 33-60 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 50-4160.

Respectfully submitted,

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/BMF/

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